INTRODUCTION:

Claim 14 is amended herein. Claims 1-19 are pending and under consideration.

Using independent claim 1 as an example, this claim recites a print module frame directly adjacent the paper feed module frame. The Examiner relies upon the casing 10 of Terao as corresponding to the claimed print module frame. It is not clear which element of Terao the Examiner construes as corresponding to the claimed paper feed module frame. It is noted that the sheet outlet 22 of the reference is not directly adjacent the casing 10. Instead, in the embodiment of FIG. 1 of the reference, the image sensor driver 18 and roller 6 are therebetween. In the embodiment of FIG. 2 of the reference, the base 19 and associated elements are therebetween.

Independent claims 4, 7 and 10 recite somewhat similar features. The remaining references do not overcome these deficiencies in Terao.

With respect to independent claim 14, this claim recites the base frame and the first, second and third units are a single piece.

Terao teaches two embodiments. The first embodiment, shown in FIG. 1 of the reference, includes a leaf spring 21 between the casing 1 (relied upon as corresponding to the claimed base frame) and the image sensor base 19 (relied upon as corresponding to the claimed scan module). Terao, FIG. 1. The leaf spring 21 biases the image sensor 13 to press the document against the roller 6. Terao, col. 4, ln. 22-25. If Terao were modified to have the claimed single piece structure, the image sensor base 19, the leaf spring 21 and the casing 1 would all be formed as a single piece. However, due to the shapes of these elements, the forming process would be extremely difficult. Specifically, the thin leaf spring 21 would have to project from the thick casing 1 and then the thick base 19 would have to project from the leaf spring 21. The formation of this thick/thin/thick structure would be so difficult that there would have been no motivation to modify the reference in this manner.

In the second embodiment of Terao, the leaf spring 21 is omitted. The discussion of this embodiment specifically states that the image reading section (including the image sensor 13 and corresponding base 19) and the image recording section are formed in the metallic casing 10 as a unit. Terao, col. 6, ln. 27-38. The image sensor base 19 is separated from the metallic casing 10. Thus, it would not be possible to form the element in metallic casing 10 as a unit and also form the image sensor base 19 to be one piece.

These distinctions result in numerous advantages as compared to Terao. Namely, the number of parts to be assembled is reduced. Accordingly, the manufacturing management costs and assembling costs can be reduced so that productivity can increase. Also, the possibility of errors arising during assembly is reduced. Furthermore, since it is not necessary to adjust the distance between parts, the time required for manufacturing is reduced. The resulting structure is durable and can better withstand shocks while being moved or used.

Accordingly, withdrawal of the rejection is requested. Mizutani does not overcome these deficiencies in Terao and Gaarder.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Response, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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By: M. Badagliacca
Michael J. Badagliacca
Registration No. 39,099

1201 New York Avenue, NW, Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501